

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Marie Elaine Burns  
**Debtor 1**

**Chapter 13**

**Case No.** 1:21-BK-00230-HWV

**Matter:** Motion for Termination of Wage Attachment Order

**MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER**

AND NOW, come the Debtor(s), Marie Elaine Burns, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about February 5, 2021.
- 2) Debtor 1 receives regular income from employment with Caresify which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
- 3) Debtor 1 wishes to terminate this wage attachment as all plan payments have been completed.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: August 21, 2025

/s/ Marie Elaine Burns

Debtor 1

**DETHLEFS PYKOSH & MURPHY**

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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Camp Hill, PA 17011  
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*Attorney for Debtor(s)*

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**ORDER OF COURT**

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS  
HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1 receives income should  
immediately cease the wage attachment in the amount of **\$56.39** from each **weekly** paycheck.

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**CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, August 21, 2025, I served a true and correct copy of the **Debtor(s)' Motion for Termination of Wage Attachment Order and proposed Order** in this proceeding upon the following:

Via USPS First Class Mail

Caresify  
Attn: Payroll Department  
704 MacDade Boulevard  
Collingdale, PA 19023

Via Electronic Means

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Sylvia H. Rambo US Courthouse  
1501 North Sixth Street, 3<sup>rd</sup> Floor  
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire